



DEPARTMENT OF THE NAVY

NORTHERN DIVISION
NAVAL FACILITIES ENGINEERING COMMAND
10 INDUSTRIAL HIGHWAY
MAIL STOP, #82
LESTER, PA 19113-2090

0873

IN REPLY REFER TO

5090
Code 1823\ME

02 SEP 1999

Ms. Kymberlee Keckler
Remedial Project Manager
U.S. Environmental Protection Agency
1 Congress Street
Suite 1100 (HBT)
Boston, MA 02114-2023

SUBJECT: RESPONSES TO USEPA COMMENTS OF JUNE 14, 1999 REGARDING
THE FINAL EXISTING DATA SUMMARY REPORT FOR THE BASEWIDE
GROUNDWATER OPERABLE UNIT REMEDIAL INVESTIGATION FOR
THE NAVAL SUBMARINE BASE NEW LONDON, GROTON, CT

Dear Ms. Keckler:

Thank you for reviewing the Final Existing Data Summary
Report for the Basewide Groundwater Operable Unit dated May 1999
for the Naval Submarine Base New London.

The Navy's responses to your comments are attached. If you
have any other questions or comments please do not hesitate to
contact me at (610) 595-0567 ext. 162.

Sincerely,

A handwritten signature in cursive script, reading "Mark Evans", is positioned above the typed name.

Mark Evans
Remedial Project Manager
By direction of the
Commanding Officer

Copy to:
Mr. Mark Lewis, CTDEP
Ms. Darlene Ward, NSB-NLON
Mr. Corey Rich, Tetra Tech NUS - Pittsburgh

**RESPONSES TO
USEPA's JUNE 14, 1999 COMMENT LETTER
REGARDING THE MAY 1999
FINAL EXISTING DATA SUMMARY REPORT
FOR THE BASEWIDE GROUNDWATER OPERABLE UNIT
REMEDIAL INVESTIGATION
NAVAL SUBMARINE BASE NEW LONDON
GROTON, CONNECTICUT**

September 1, 1999

GENERAL COMMENTS (Cover Letter)

3. Cover Letter; First page; Third paragraph

Comment: In response to general comment 3, the original comment requested clarification of the link between COPCs identified in soils, sediments, and surface water and COPCs in groundwater.

Response: Comment noted. The Navy considered the results of the site-specific COPC screening assessment provided in the final EDSR during the development of the draft Basewide Groundwater OU RI WP/SAP.

4. Cover Letter; First page; Fourth paragraph

Comment: The intent of the original general comment 4 was not to suggest that all samples be analyzed for every compound. Rather, a complete analyte list should be retained for any samples taken from *new wells* not previously sampled. This issue should be addressed at the time of the development of the SAP.

Response: Comment noted. The Navy addressed this issue during the development of the draft Basewide Groundwater OU RI WP/SAP.

SPECIFIC COMMENTS

2. p. 2-45, §2.3.4.2

Comment: The original Comment requested a geochemical assessment of sources and transport mechanisms for inorganics, particularly with respect to the impact of the landfill on redox conditions and the mobility of arsenic and lead. Although the February 1999 response was positive, the revised EDSR does not address this issue explicitly. The EDSR does, however, leave room for such an assessment through its rather general statement (§2.3.7, p. 2-56), "...The results of the sampling activities should be evaluated within the Basewide Groundwater OU RI." It should be

noted that an assessment of the influence of the landfill on the groundwater chemistry and transport of inorganics remains an essential part of the Basewide Groundwater OU RI.

Response: Comment noted. The Navy addressed this issue during the development of the draft Basewide Groundwater OU RI WP/SAP.

3. p. 2-54, §2.3.7

Comment: Specific monitoring well coverage for the Area A Wetland is deferred to the long-term monitoring plan (LTMP). While this deferral is appropriate, it should be noted that the scope of the necessary monitoring in this area remains unresolved.

Response: Comment noted. The Navy addressed this issue during the development of the draft Basewide Groundwater OU RI WP/SAP.

5. p. 2-63, §2.4.4

Comment: One critical function of monitoring is to verify that the remedies in place are effective. Monitoring of surface water in Site 3 should be discussed in conjunction with the design of the LTMP.

Response: Surface water will be one of the media included in the post remediation Long Term Monitoring Program developed for Site 3.

6. p. 2-63, §2.4.4.1

Comment: EPA's original comment recommended an overburden/bedrock well pair in the area immediately downgradient of the dike separating the Area A Wetland and Site 3. However, the specific issue of a bedrock well at the recommended location is not addressed, and it is noted that it must still be resolved in some forum (e.g., discussion of the groundwater monitoring program for the Area A Landfill).

Response: Comment noted. The Navy addressed this issue during the development of the draft Basewide Groundwater OU RI WP/SAP.

10. p. 2-71, §2.4.7

Comment: Although the Navy agrees that additional monitoring wells are needed to delineate the VOC plume downgradient of the Torpedo Shops, many of EPA's specific recommendations are unresolved. Resolution is deferred to the SAP for the Basewide Groundwater OU RI and the subsequent review process.

Response: Comment noted. The Navy addressed this issue during the development of the draft Basewide Groundwater OU RI WP/SAP.

12. p. 2-93, §2.7.4

Comment: The original review comment requested further discussion in support of the claim that contaminated sediment and surface water at the Torpedo Shops area are "not expected to impact the groundwater at this site." Navy's Response promised to provide the appropriate arguments. The revised text of §2.7.4, p. 2-95 does not appear to reflect these changes.

Response: Comment noted. The Navy addressed this issue during the development of the draft Basewide Groundwater OU RI WP/SAP.

15. p. 2-120, §2.9.4.2

Comment: The original Comment requested that further work be done to understand low-level detections of chlorinated VOCs in bedrock well 2WMW4D. The response proposed to re-sample the well pair (2WMW4S, 2WMW4D). This explicit recommendation does not appear to be presented in the revised report. The re-sampling of this well pair remains a worthwhile target.

Response: Comment noted. The Navy addressed this issue during the development of the draft Basewide Groundwater OU RI WP/SAP.

16. Tables

Comment: The revised EDSR does not reflect the changes in RBCs. The updated RBC table must be used in the Basewide Groundwater RI.

Response: Comment noted. The Navy addressed this issue during the development of the draft Basewide Groundwater OU RI WP/SAP.